2024R00810/KR

OCT 24 2024

#### UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

AT 8:30 2:24 P

UNITED STATES OF AMERICA

Hon. (MEF)

v.

Crim. No. 24-713

JIMMIE BOWENS,

21 U.S.C. § 846

a/k/a "Boonka"

21 U.S.C. §§ 841(a)(1), (b)(1)(B),

and (b)(1)(C)

18 U.S.C. § 922(g)(1)

#### INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

#### **COUNT ONE**

(Conspiracy to Distribute Controlled Substances)

From in or around December 2022 through on or about June 1, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

#### JIMMIE BOWENS, a/k/a "Boonka,"

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

#### **COUNT TWO**

(Possession with Intent to Distribute Controlled Substances)

On or about June 1, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

# JIMMIE BOWENS, a/k/a "Boonka,"

did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, a quantity of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

#### **COUNT THREE**

(Possession of Firearms and Ammunition by a Convicted Felon)

On or about June 1, 2023, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

# JIMMIE BOWENS, a/k/a "Boonka,"

knowing that he had previously been convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess two firearms and ammunition, namely: a Ruger Max-9 9mm handgun, bearing serial number 350046066, which was loaded with one round of 9mm ammunition; a Taurus G2A 9mm handgun, bearing serial number TMB31081, which was loaded with six rounds of 9mm ammunition; approximately 36 rounds of Remington long rifle hollow point ammunition; and approximately 29 rounds of Remington high velocity .22 caliber ammunition, and the firearms and ammunition were in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

#### FORFEITURE ALLEGATION AS TO COUNTS ONE AND TWO

- 1. The allegations contained in Counts One and Two of this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.
- 2. Upon conviction of the offenses in violation of Title 21, United States Code, Sections 846, 841(a)(1), (b)(1)(B), and (b)(1)(C), set forth in Counts One and Two of this Indictment, the defendant,

#### JIMMIE BOWENS, a/k/a "Boonka,"

shall forfeit to the United States of America, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Counts One and Two of this Indictment.

### FORFEITURE ALLEGATION AS TO COUNT THREE

- 1. The allegations contained in Count Three of this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1), and Title 28, United States Code, Section 2461(c).
- 2. Upon conviction of the firearms offense in violation of Title 18, United States Code, Sections 922(g)(1), set forth in Count Three of this Indictment, the defendant,

# JIMMIE BOWENS, a/k/a "Boonka,"

shall forfeit to the United States any firearms and ammunition involved in or used in the commission of such offense, including, but not limited to, the following:

- (1) a Ruger Max-9 9mm handgun, bearing serial number 350046066, which was loaded with one round of 9mm ammunition;
- (2) a Taurus G2A 9mm handgun, bearing serial number TMB31081, which was loaded with six rounds of 9mm ammunition;
- (3) approximately 36 rounds of Remington long rifle hollow point ammunition; and
- (4) approximately 29 rounds of Remington high velocity .22 caliber ammunition.

### **Substitute Assets Provision** (Applicable to All Forfeiture Allegations)

Document 32

If any of the property described above, as a result of any act or omission of the defendant:

- cannot be located upon the exercise of due diligence; a.
- b. has been transferred or sold to, or deposited with, a third party;
- has been placed beyond the jurisdiction of the court; C.
- has been substantially diminished in value; or d.
- has been commingled with other property which cannot be e. divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

A TRUE BILL

FOREPERSON

PHILIP R. SELLINGER United States Attorney

CASE NUMBER: 24- 713(MEF)

## **United States District Court District of New Jersey**

#### UNITED STATES OF AMERICA

v.

JIMMIE BOWENS, a/k/a "Boonka"

### INDICTMENT FOR

21 U.S.C. § 846 21 U.S.C. §§ 841(a)(1), (b)(1)(B), and (b)(1)(C) 18 U.S.C. § 922(g)(1)

A True Bill,

Foreperson

PHILIP R. SELLINGER UNITED STATES ATTORNEY FOR THE DISTRICT OF NEW JERSEY

KENDALL RANDOLPH JOSEPH STERN ASSISTANT U.S. ATTORNEYS NEWARK, NEW JERSEY 973-645-3659